REMARKS

Reconsideration and allowance are respectfully requested in light of the above amendments and the following remarks.

All claim elements have now been placed in non-means-plus-function format; all method steps are already in non-step-plus-function. Thus, the provisions of 35 USC 112, sixth paragraph, are inapplicable to the construction of any aspects of the present claims.

The Advisory Action alleges that the features upon which the Applicants rely are not recited in the rejected claims and cites "exchanging an APDU between a smart card and a remote server" as a feature upon which the Applicants rely.

However, this allegation is incorrect. In the Response filed December 5, 2005, "exchanging an APDU between a smart card and a remote server" is not presented as a feature upon which the Applicants rely, but only as the direct result of the following feature upon which the Applicants rely: "directly encapsulating APDUs coming from the PSD interface of a client into outgoing messages sent to the remote computer system over the network and directly routing, to the PSD interface, the APDUs desencapsulated by the client from messages received from the remote computer system over the network."

This feature is similar to of: "receiving incoming APDUs from said PSD interface, encapsulating said incoming APDUs into outgoing message packets and routing said outgoing message packets to said remote computer system", "receiving incoming message packets from said remote computer system ... separating encapsulated APDUs from said incoming message packets thus generating desencapsulated APDUs and routing said desencapsulated APDUs to said PSD through said PSD Interface independently of the origin and integrity of said incoming message packets," which can be read in claim 1.
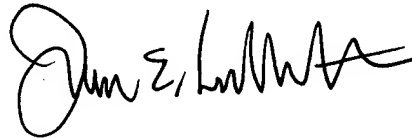
Moreover, the Advisory Action indicates disagreement with the Applicants' arguments according to which "the DiGiorgio reference does not disclose that the second data processing means is capable of encapsulating outgoing message packets".

This is incorrect. In the Response filed December 5, 2005, it is not argued that "the DiGiorgio reference does not disclose that the second data processing means is capable of encapsulating outgoing message packets." On the contrary, it is said that although "computer system 14 may also have a second data processing means for encapsulating APDUs into outgoing message packets," "nothing is described in DiGiorgio's specification concerning incoming APDUs, from smart card 10, that would be directly encapsulated by computer 14 into message packets."

It is submitted that all pending claims are allowable for the reasons given in the Response filed December 5, 2005, supplemented by the above comments, and that this application is in condition for allowance. A notice to that effect is respectfully solicited.

If any issues remain which may best be resolved through a telephone communication, the Examiner is requested to telephone the undersigned at the local Washington, D.C. telephone number listed below.

Respectfully submitted,

James E. Ledbetter
Registration No. 28,732

Date: February 3, 2006
JEL/DWW/att

Attorney Docket No. L741.01101
STEVENS DAVIS, MILLER & MOSHER, L.L.P.
1615 L Street, N.W., Suite 850
P.O. Box 34387
Washington, D.C. 20043-4387
Telephone: (202) 785-0100
Facsimile: (202) 408-5200